



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 1, 2017

To: Julian Hayward, GHD

From: Leslie Patterson, U.S. EPA

A handwritten signature in black ink, appearing to be "LP", is written next to the name Leslie Patterson.

Subject: Supplemental Comments on the draft *Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Operable Units 1 and 2*, dated July 26, 2016
South Dayton Dump & Landfill, Moraine, Ohio
Administrative Settlement Agreement and Order and Consent V-W-16-C-011

EPA, in consultation with the Ohio Environmental Protection Agency (OEPA), has further reviewed the document referenced above. EPA requires the respondents to the ASAOC referenced above to amend the document in accordance with the attached comments in addition to the comments EPA sent on February 24, 2017. These additional comments are numbered in sequence with the comments sent previously. All of the comments must be addressed. If all comments are not adequately addressed, EPA may exercise its right to modify the document and provide the revised document to you for implementation or to direct you to make specified modifications to the document. If you believe that any changes are necessary other than those directed by EPA's enclosed comments, those changes must be discussed with, and approved by, myself, in consultation with OEPA, prior to re-submittal of the document. Those discussions may be memorialized in a progress report or other communication to me. In addition, all changes made to the document, other than those made specifically at the direction of EPA, must be specified in writing to EPA upon re-submittal of the document.

A revised workplan must be submitted within 30 days of your receipt of the enclosed comments, as specified in Exhibit A of the ASAOC. If you have any questions concerning this matter, or would like to discuss these comments in detail, please contact me at (312) 886-4904.

Comments

64. **Section 2.2.4:** The 2nd bullet describes perched groundwater, but it is not clear in the workplan the extent to which the perched groundwater may be a migration pathway for contamination. In the appropriate section (perhaps Section 3), discuss this potential, and clarify that perched groundwater will be sampled if found.
65. In addition to the concerns identified in EPA's Comment 29.d.ii about using parcel 3264 for background samples, EPA notes that this parcel is in the 100 year flood plain and downstream of the site. Flooding of the area may have relocated soil contamination from the site onto this parcel, making it even less suitable as a background location.